

# EXHIBIT C

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**From:** Kravis, Jonathan (USADC) <Jonathan.Kravis3@usdoj.gov>  
**Sent:** Tuesday, January 22, 2019 4:00 PM  
**To:** Seikaly, Kate J  
**Cc:** jsr@usdoj.gov; Ira@usdoj.gov; Alpino, Heather (NSD) (JMD); Rakoczy, Kathryn (USADC); Curtis, Deborah (USADC)  
**Subject:** RE: Concord

Hi Kate,

Thank you for bringing this matter to my attention. We do not intend to provide a bill of particulars. The indictment states the charges with sufficient precision to allow Concord to understand the charges, prepare a defense, and avoid retrial on the same charges. The categories of information requested in your letter appear designed to preview the government's evidence, which is not the purpose of a bill of particulars.

Thanks,  
Jonathan

Jonathan Kravis  
Deputy Chief, Fraud and Public Corruption Section  
U.S. Attorney's Office for the District of Columbia  
202-252-6886

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**From:** Seikaly, Kate J <KSeikaly@ReedSmith.com>  
**Sent:** Thursday, January 17, 2019 2:08 PM  
**To:** Kravis, Jonathan (USADC) <JKravis1@usa.doj.gov>  
**Cc:** jsr@usdoj.gov; Ira@usdoj.gov; Alpino, Heather (NSD) (JMD) <Heather.Alpino@usdoj.gov>; Rakoczy, Kathryn (USADC) <KRakoczy2@usa.doj.gov>; Curtis, Deborah (USADC) <DCURTIS4@usa.doj.gov>  
**Subject:** Concord

Jonathan,

On April 11, 2018, we sent the attached letter requesting a bill of particulars. On May 17, 2018, Ms. Rhee stated that the government would not be providing any of the information requested. Nevertheless, we request a written response to our letter and specifically an explanation of your position as to whether or not we are entitled to the information requested.

To avoid any confusion, our request related to paragraph 2 of the Indictment for the names of all alleged conspirators known to the government is intended as a request for the identity of all unindicted co-conspirators. As you know, it is the practice of courts in this district to grant requests for this information. See, e.g., *U.S. v. Hubbard*, 474 F. Supp. 64, 81 (D.D.C. 1979); *U.S. v. Trie*, 21 F. Supp. 2d 7, 22 (D.D.C. 1998); *U.S. v. Ramirez*, 54 F. Supp. 2d 25, 30 (D.D.C. 1999); *U.S. v. Karake*, 281 F. Supp. 2d 302, 310 (2003); *U.S. v. Brodie*, 326 F. Supp. 2d 83, 91 (D.D.C. 2004).

Given that we sent our request more than eight months ago, we would appreciate a written response by 5 pm on Tuesday, January 22.

Thanks,  
Kate

Kate Seikaly  
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